

UNITED STATES OF AMERICA	*	CRIMINAL NO. 08-188
v.	*	SECTION: “N”
RAYMOND NARO, JR.		

* * *

If this case were to proceed to trial, the United States would prove the following facts beyond a reasonable doubt:

Quincy BROWN distributed large quantities of cocaine hydrochloride and cocaine base to other dealers and users on a daily basis. Frank VENEGAS and Raymond NARO assisted Brown with his drug trafficking activities. VENEGAS and NARO drove BROWN to conduct drug sales and on occasion distributed drugs on his behalf.

For example, on Friday, May 4, 2007, a DEA confidential source (CS) contacted BROWN via cellular telephone and arranged to purchase a \$50.00 quantity of cocaine. BROWN instructed the CS to meet him at a restaurant located in Metairie, Louisiana. After establishing surveillance at the restaurant agents observed a green Ford Escape being driven by Frank VENEGAS, park the Ford Escape behind the CS's vehicle. VENEGAS exited the vehicle, and handed the CS one clear plastic bag containing approximately one-half gram of cocaine in exchange for \$50.00. After the exchange, both VENEGAS and the CS left the parking lot. The CS met agents at a pre-arranged location where the CS relinquished custody of the cocaine to agents.

On Friday, June 22, 2007, the UC met BROWN, who was accompanied by Frank VENEGAS and Raymond NARO, at a local restaurant. During the meeting, the confidential source (CS) introduced the UC to BROWN and the negotiations for the purchase of crack cocaine from BROWN ensued. BROWN told the UC that he (BROWN) sells ounce quantities of crack cocaine and directed the UC to go through the CS who would arrange the purchases with BROWN.

On Thursday, June 28, 2007, the CS placed a recorded and monitored telephone call to BROWN and arranged to purchase \$100.00 of cocaine and the UC arranged to purchase a \$200.00 quantity of crack cocaine. BROWN instructed the CS and the UC to meet him at a local restaurant in Metairie, Louisiana. A short time later, a tan colored Chevrolet pick-up truck driven by NARO with BROWN seated in the passenger seat, arrived at the restaurant and parked beside the CS's vehicle. NARO entered the restaurant and summoned the CS and UC to come outside, which they did. Upon NARO'S return to the truck, he (NARO) tossed a plastic bag containing approximately

4.4 grams of crack cocaine and approximately 2.1 grams of cocaine hydrochloride into the CS's vehicle. The CS and the UC handed BROWN \$100.00 and \$200.00 respectively and proceeded out of the area.

From September 2007 through February 2008, BROWN continued to distribute quantities of cocaine hydrochloride and cocaine base to the UC and others. BROWN was arrested on June 30, 2008. Following his arrest, BROWN consented to the searches of his residences which are located 6544 Milne Boulevard, New Orleans, Louisiana, and 6840 Catina Street, New Orleans, Louisiana. During the searches of BROWN's two (2) residences, Agents seized approximately one hundred (100) grams of cocaine hydrochloride and U.S. currency. All substances obtained from members of the organization were later tested at the Drug Enforcement Administration laboratory and tested positive for cocaine hydrochloride and cocaine base.

The undersigned prosecutor and DEA Special Agents assigned to this investigation have done a thorough review of all drug types and quantities provable during the entire course of the conspiracy. The amount of narcotics that NARO is responsible for distributing or that was reasonably foreseeable to him as being distributed in this case includes a total quantity of at least four hundred grams but less than five hundred grams of cocaine hydrochloride and at least four grams but less than five grams of cocaine base. This assessment was arrived at through careful

analysis of all seizures, consensually monitored telephone calls, law enforcement surveillance, telephone records analysis and witness interviews.

Read and Approved:

RAYMOND NARO
Defendant

Date

JIM O'CONNOR
Defense Counsel

Date

TRACEY N. KNIGHT
Assistant United States Attorney

Date